

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Communications Assistance for</b>	)	<b>ET Docket No. 04-295</b>
<b>Law Enforcement Act and</b>	)	
<b>Broadband Access and Services</b>	)	
	)	<b>RM-10865</b>

**To the Commission:**

**Comments of:**

**THE RURAL TELECOMMUNICATIONS PROVIDERS**

**November 8, 2004**

## TABLE OF CONTENTS

TABLE OF CONTENTS.....	i
ISSUES .....	1
I. THE COMMISSION SHOULD CONTINUE TO ALLOW SMALL AND RURAL CARRIERS TO SEEK AN EXTENSION OF CALEA’S REQUIREMENTS .....	2
II. THE COMMISSION NEEDS TO CLARIFY WHICH PACKET-MODE SERVICES ARE SUBJECT TO CALEA BEFORE REFUSING TO GRANT FURTHER EXTENSIONS .....	3
III. THE COMMISSION HAS ALREADY PLACED A HIGH BURDEN ON ANY RURAL CARRIERS THAT SEEK A SECTION 109(b) WAIVER .....	5
IV. THE COST FOR CALEA COMPLIANCE FOR RURAL CARRIERS IS SIGNIFICANT AND RECOVERY SHOULD NOT BE BORNE EXCLUSIVELY BY THE CARRIERS AND THEIR CUSTOMERS .....	7
A. The Commission and Law Enforcement fail to understand the ability of carriers to recover costs associated with CALEA compliance .....	9
B. The Commission Should Adopt Cost Recovery Rules that Do Not Place the Burden Solely on Carriers.....	9
V. THE CONCLUSION THAT FACILITIES-BASED PROVIDERS OF ANY TYPE OF BROADBAND INTERNET ACCESS SERVICE ARE SUBJECT TO CALEA IS INCORRECT.....	10
VI. NON-MANAGED PACKET MODE INFORMATION MAY BE EXTRACTED FROM THE CORE SWITCH OR ROUTER .....	11
VII. THE TRUSTED THIRD PARTY APPROACH MAY BE BENEFICIAL FOR LARGE CARRIERS WITH MANY REQUESTS FOR INTERCEPTS BUT NOT FOR SMALL RURAL CARRIERS .....	12
CONCLUSION.....	12

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Communications Assistance for</b>	)	<b>ET Docket No. 04-295</b>
<b>Law Enforcement Act and</b>	)	
<b>Broadband Access and Services</b>	)	
	)	<b>RM-10865</b>

**To the Commission:**

**Comments of:**

**THE RURAL TELECOMMUNICATIONS PROVIDERS**

The Rural Telecommunications Providers set forth on Attachment "A", (collectively "Rural Carriers"), by and through their attorneys, submit these comments in response to the Federal Communications Commission's ("FCC") Notice of Proposed Rulemaking and Declaratory Ruling issued in response to the Petition for Expedited Rulemaking filed by the Federal Bureau of Investigation, the U.S. Department of Justice, and the U.S. Drug Enforcement Agency (collectively "Law Enforcement") requesting expedited resolution of issues regarding compliance and implementation of the Communications Assistance for Law Enforcement Act ("CALEA"), especially packet-mode compliance.<sup>1</sup>

Rural Carriers support Law Enforcement's goals to protect the nation from criminal and terrorist activity, and, in most cases, have complied with the mandate of CALEA as it pertains to the implementation and installation of hardware and software for their central offices for the Section 103, J-STD-025 capabilities and Punch List requirements. While the Rural Carriers also

---

<sup>1</sup> Notice of Proposed Rulemaking and Declaratory Ruling, ET Docket No. 04-295, RM-10865 Released August 9, 2004 ("NPRM"); and *Public Notice*, Comment Sought on CALEA Petition for Rulemaking, RM-10865, DA No. 04-700 (Mar. 12, 2004) ("Public Notice").

are committed to cooperating with the FCC and Law Enforcement to deploy the appropriate technology for packet-mode interception, the Rural Carriers do not support all of the proposals set forth in the NPRM as set forth below.

## ISSUES

### **I. THE COMMISSION SHOULD CONTINUE TO ALLOW SMALL AND RURAL CARRIERS TO SEEK AN EXTENSION OF CALEA'S REQUIREMENTS**

Rural Carriers fully recognize the importance of being able to readily and efficiently perform electronic surveillance and, for this reason, have worked cooperatively with Law Enforcement on every request for information presented to them. However, most Rural Carriers have not received a request for intercept since CALEA was enacted and for many years prior. Nevertheless, these carriers have participated fully in the FBI's Flexible Deployment Program and, in nearly every case, have upgraded their facilities to comply with CALEA's J-STD-025 requirements.<sup>2</sup> The carriers have completed these upgrades in accordance with the Flexible Deployment Program.<sup>3</sup>

Likewise, nearly all of the Rural Carriers have either upgraded their facilities to comply with CALEA's punch list requirements or have specific plans to be punch list-compliant by June

---

<sup>2</sup> The Rural Carriers that have not upgraded their facilities to comply with CALEA's J-STD-025 requirements are awaiting the FBI's final rules defining "significant upgrade" and "major modification" as those terms apply to equipment and facilities that were installed on or before January 1, 1995. *See* Implementation of Section 109 of the Communications Assistance for Law Enforcement Act: Definitions of "Replaced" and "Significantly Upgraded or Otherwise Undergoes Major Modification," *Supplemental Notice of Proposed Rulemaking*, 66 Fed. Reg. 194 (Oct. 5, 2001).

<sup>3</sup> "The FBI's overall CALEA implementation approach includes supporting telecommunications carriers' deployment of CALEA-compliant solutions in accordance with their normal generic upgrade cycles, where such deployment will not delay implementation of CALEA solutions in areas of high priority to Law Enforcement. This approach is the result of the FBI's recognition of the issues facing carriers and represents an attempt to minimize the costs and operational impact of CALEA compliance on all carriers." <http://askcalea.net/flexd.html> (last visited Oct. 13, 2004).

30, 2006. Rural Carriers also intend to comply with CALEA's packet-mode requirements as soon as reasonably feasible. Rural Carriers simply need additional time for upgrades to be made available by their vendors and, subsequently, to order, install and test the upgrades.<sup>4</sup> These carriers' intercept history demonstrates that the public will not be harmed by allowing them additional time to comply with all of CALEA's capability requirements. To the contrary, the public would be significantly harmed if these carriers were forced to discontinue some or all of their services because they were unable to meet the Commission's compliance deadline, were not allowed to seek an extension and, consequently, were likely to face FCC and other enforcement action for noncompliance.

## **II. THE COMMISSION NEEDS TO CLARIFY WHICH PACKET-MODE SERVICES ARE SUBJECT TO CALEA BEFORE REFUSING TO GRANT FURTHER EXTENSIONS**

One of the primary reasons Rural Carriers have not upgraded their packet-mode facilities to comply with CALEA's capability requirements is because they are uncertain which, if any, of their services or facilities are subject to CALEA. To date, with the exception of the Commission's clarification in this proceeding that push-to-talk technologies are subject to CALEA, the only description the Commission has provided of packet-mode services that are subject to CALEA is in the *Third Report and Order* released August 31, 1999.<sup>5</sup> Many carriers remain uncertain, for instance, whether either voice or data DSL services are subject to CALEA and, if they are, what equipment needs to be identified in extension requests – just the host

---

<sup>4</sup> Even with the third party vendor proposal referenced in the NPRM, Carriers still must upgrade their facilities to comply with CALEA's capability requirements. For Rural Carriers, this is 99% of the hurdle, given the minimal requests for intercept that they receive.

<sup>5</sup> *In re Communications Assistance for Law Enforcement Act*, FCC 99-230, ¶¶ 47-56.

switch, the DSLAMs, both? And if the DSLAMs, do carriers need to update their extension request every time a DSLAM changes, which could be weekly if not daily?<sup>6</sup>

Rural Carriers are not the only ones who need further clarification regarding which packet-mode services are subject to CALEA. As demonstrated by many of Rural Carriers' packet-mode extension requests, a number of packet-mode equipment vendors informed the Rural Carriers that they do not believe their equipment is subject to CALEA.<sup>7</sup> Accordingly, Rural Carriers recommend the Commission proceed as it did for the Section 103, J-STD-025 capabilities and Punch List Requirements and work with equipment vendors to develop a packet-mode solution.

Given this uncertainty, refusing to allow carriers to seek a further packet-mode extension and immediately subjecting non-compliant carriers to enforcement action will not further either the Commission's or Law Enforcement's goal of expediting CALEA implementation. Rural Carriers are not waiting for the Commission to stop allowing extensions before they comply with CALEA's packet-mode requirements – they simply need clarification, as do packet-mode equipment vendors, regarding the packet-mode services the Commission considers subject to CALEA. Additionally, Rural Carriers need to know whether, for any packet-mode services that are deemed subject to CALEA, are carriers required to upgrade each piece of equipment the

---

<sup>6</sup> See also, Reply Comments of the Arkansas, Illinois, Iowa and Oklahoma Rural Telephone Companies, RM-10865, filed April 27, 2004, at p. 5 (“The Commission should clarify what types of telecommunications services are subject to CALEA’s packet-mode requirements ... Some carriers elected not to seek a packet-mode extension for their DSL service due to confusion....”).

<sup>7</sup> See, e.g., Memorandum from Alcatel to General Distribution dated Jan. 27, 2004, regarding Products Alcatel 7470 Multiservice Platform, Alcatel 7270 Multiservice Concentrator, Alcatel 7670 Edge Services Extender, Alcatel 7670 Routing Service Platform (“It is Alcatel’s contention that the Products cited are not subject to CALEA conformance. This may change as CALEA is extended to cover the types of traffic that may be carried over Frame Relay, ATM, and/or IP data networks where Alcatel’s products may span a Surveillance Boundary.”).

packet-mode communication passes through or only the highest level of equipment, provided all the communication passes through such equipment.

### **III. THE COMMISSION HAS ALREADY PLACED A HIGH BURDEN ON ANY RURAL CARRIERS THAT SEEK A SECTION 109(b) WAIVER**

The NPRM suggests that more carriers will likely seek a Section 109(b) waiver if they are unable to seek an extension and sets forth the information carriers would need to include in any Section 109(b) petition, stating that carriers “face a high burden in making an adequate showing to obtain alternative relief pursuant to section 109(b).”<sup>8</sup> Rural Carriers, however, already face a high burden simply in filing a Section 109(b) waiver, in the form of the \$5,210 filing fee. Furthermore, as the Commission has stated, filing a Section 109(b) waiver does not automatically toll the compliance deadline.<sup>9</sup> Consequently, any carrier that is not compliant by whatever date the FCC establishes in this proceeding will automatically face potential enforcement action, even if they seek the only avenue available to them by filing a Section 109(b) waiver. Once again, this is not going to make Rural Carriers suddenly become packet-mode compliant.

The Commission appears to be taking the position that all entities subject to CALEA will be packet-mode compliant regardless of whether a solution is available. The conclusion that the requirements of section 109(b) would not be met by a petitioning carrier who asserts that CALEA standards have not been developed or solutions are not available from manufacturers is

---

<sup>8</sup> NPRM at ¶ 98.

<sup>9</sup> See CALEA Section 103 Compliance and Section 107(c) Petitions, *Public Notice*, FCC 00-154, rel. Apr. 25, 2000 at n. 7 (“Given ... the fact that the filing of a section 109 petition does not automatically stay compliance with section 103 requirements, it is likely that carriers facing [a compliance] deadline run the risk of failing to comply with section 103 unless they either come into compliance or obtain a section 107 extension of time by that date.”).

totally unreasonable and illogical.<sup>10</sup> If there is no solution, no one can comply with CALEA regardless of the existence of Petition 107(c) and 109(b) extensions. Rural Carriers do not have the personnel or economic resources to develop a solution that is specific to their equipment. Therefore, they must rely on their equipment vendors to provide a solution.

Even if the Commission resolves any ambiguity regarding the types of services and equipment that must be compliant and equipment manufacturers quickly develop CALEA-compliant packet-mode equipment and make it available to carriers by the time the Commission adopts rules in this proceeding, the Commission's proposal to require carriers to be compliant within 90 days is not nearly long enough.<sup>11</sup> This should be evident from the Commission's history with punch list extensions wherein the Commission provided carriers with just over 75 days from the date it adopted final punch list rules to either comply with the punch list requirements or seek an extension.<sup>12</sup> As the Commission noted in the NPRM, it received more than 900 section 107(c) petitions addressing punch list functionalities.<sup>13</sup>

Even in "normal circumstances" where carriers elect to upgrade their facilities during their normal course of business, it is difficult at best to have the equipment delivered, installed and tested to make sure it operates seamlessly in the carrier's network within 90 days. If all 800 carriers that have a current extension request on file were required to upgrade their facilities within the same 90-day period, it would be physically impossible for equipment vendors to

---

<sup>10</sup> NPRM at ¶ 98.

<sup>11</sup> NPRM at ¶ 91.

<sup>12</sup> *In re Communications Assistance for Law Enforcement Act, Order on Remand*, FCC 02-108 (rel. Apr. 11, 2002).

<sup>13</sup> NPRM at n. 221.



install the new equipment in all 800 networks within that time period.<sup>14</sup> Consequently, under the Commission's proposal, carriers would then be deemed noncompliant and even filing a Section 109(b) waiver would not insulate them from potential enforcement action.

Subjecting carriers to enforcement action in this instance will not cause them to become compliant sooner.<sup>15</sup> Instead, some small and rural carriers may decide to discontinue offering packet-mode service rather than risk significant fines. Such a result would be contrary to both Congress' and the Commission's goals of promoting new technologies, especially in rural parts of the country that are not served by the larger carriers.

#### **IV. THE COST OF CALEA COMPLIANCE FOR RURAL CARRIERS IS SIGNIFICANT AND RECOVERY SHOULD NOT BE BORNE EXCLUSIVELY BY THE CARRIERS AND THEIR CUSTOMERS**

Law Enforcement's contention that responsibility for CALEA compliance should rest solely with the carrier and their customers is inequitable and imposes a huge financial burden upon rural carriers.<sup>16</sup> It is also unreasonable to request that the Commission eliminate the issue of cost as a basis for delayed compliance or non-compliance with CALEA.<sup>17</sup> As set forth in the Reply Comments of the Arkansas, Illinois, Iowa and Oklahoma Telephone Companies in this proceeding, small rural carriers have expended hundreds of thousands of dollars on CALEA compliance, serve a small subscriber base, and many have no history of intercepts.<sup>18</sup>

---

<sup>14</sup> See NPRM at ¶ 95 ("Since November 19, 2003, we have received more than 800 packet-mode extension petitions from large and small telecommunications carriers....").

<sup>15</sup> "We believe it is in the public interest for covered carriers to become CALEA compliant as expeditiously as possible and recognize the importance of effective enforcement of Commission rules affecting such compliance." NPRM at ¶ 116.

<sup>16</sup> NPRM at ¶ 123.

<sup>17</sup> Id.

What the FCC and Law Enforcement fail to understand is that the cost for CALEA compliance is not proportional to the size of the carrier, and the upgrade to a small rural carrier's central office switch costs the same as an upgrade to a larger carrier with a larger customer base. For example, a rural carrier that serves a few thousand customers may utilize the same central office switch as a RBOC that serves hundreds of thousands of customers. The hardware and software necessary for the CALEA upgrade can be the same for both carriers at the same cost.

As set forth by the Arkansas, Illinois, Iowa and Oklahoma Telephone Companies, one rural carrier has expended over \$550,000 to comply with CALEA's J-STD-025 capability and Punch List requirements and its residential subscriber base is approximately 4463. This equates to a cost of \$125.00 per customer for CALEA compliance.<sup>19</sup> Compared to a large carrier that can easily serve 100,000 customers due to its dense subscriber base, the same \$550,000 CALEA upgrade only costs \$5.50 per customer; a drastic difference from \$125.00 per customer. Thus, requiring the Rural Carriers' customer base to "pick up the tab" is discriminatory and inequitable to rural carriers and their customers because large carriers such as the RBOCs have a much larger subscriber base to recover the cost of CALEA compliance.

The Rural Carriers also rebut the Commission's presumption that carriers will become CALEA compliant in the course of general network upgrades and will recover any additional cost of CALEA compliance through their normal charges.<sup>20</sup> Although the J-STD-025 and Punch List capabilities have been included in some general network upgrades, they come with an additional cost. Further, depending on the switch manufacturer, carriers have had to purchase

---

<sup>18</sup> See Reply Comments of the Arkansas, Illinois, Iowa and Oklahoma Rural Telephone Companies at p. 7.

<sup>19</sup> *Id.*

<sup>20</sup> See NPRM at ¶126.

additional hardware and software just to meet CALEA's requirements.<sup>21</sup> Many carriers would not have upgraded to their current generic release if not for the mandate to become CALEA compliant. These CALEA expenditures are not recoverable through general charges.

**A. The Commission and Law Enforcement fail to understand the ability of carriers to recover costs associated with CALEA compliance**

To date, Rural Carriers have expended hundreds of thousands of dollars on only the J-STD-025 and Punch List capabilities. For example, averaging the cost of CALEA compliance of five rural LECs ranging in size from 900 access lines to 5,257 access lines, the average cost of CALEA compliance has been approximately \$300,000. For Rural Carriers that are cost companies, CALEA expense can be applied to the interstate allocation of central office switching equipment, and can be recovered through normal cost separation procedures at the federal level.<sup>22</sup> However, these interstate amounts must be depreciated over the life of the central office plant, which averages fifteen years, and does not take into account the Rural Carriers' initial outlay of hundreds of thousands of dollars. Although in some instances the partial interstate CALEA expense can be recovered, absent any state funding, most Rural Carriers have no mechanism to recover the intrastate portion of CALEA expense. Unlike most switch upgrades which allow the RTCs to deploy new services to end-users, thus bringing in revenues, the CALEA upgrades do not generate any end-user revenue to assist in recovery.

**B. The Commission Should Adopt Cost Recovery Rules that Do Not Place the Burden Solely on Carriers.**

Rural Carriers encourage the commission to adopt Rules allowing Carriers to recover costs from the cost causer. In doing so, the Commission should recognize that permitting

---

<sup>21</sup> Carriers with Nortel switches are required to purchase NT4T50 cards specifically for the CALEA dialed digit extraction requirement at a cost of approximately \$560 each. Furthermore, many carriers have had to purchase additional shelves in order to hold the card.

<sup>22</sup> See 47 C.F.R. § 36.125.

carriers to recover costs from end-user customers is only one alternative. Rural Carriers also recommend that Law Enforcement seek Congressional assistance in obtaining funds for CALEA compliance.

As more fully discussed above, it is the Rural Carriers' contention that the CALEA Section 109(b) petition process is neither a sufficient, nor reasonable alternative to address the burdensome cost issues affecting small rural carriers. Further, it is not only cost considerations that affect CALEA compliance of the Rural Carriers. Rather, there is also the problem of having available solutions. Therefore, the Commission's contention that Section 107(c) extensions for CALEA be eliminated, coupled with their statement that a Section 109(b) request for extension based on the availability of solutions would not be sufficient, does not make sense.<sup>23</sup> It appears the Commission is trying to eliminate all possibility of extensions whether the reason is the cost or the unavailability of a packet-mode solution. The Rural Carriers are becoming CALEA compliant, and the inference that the carriers are somehow abusing the 107(c) extension processes is false.

**V. THE CONCLUSION THAT FACILITIES-BASED PROVIDERS OF ANY TYPE OF BROADBAND INTERNET ACCESS SERVICE ARE SUBJECT TO CALEA IS INCORRECT**

Law Enforcement has concluded that all facilities-based providers of broadband Internet access service are subject to CALEA because they provide a replacement for a substantial portion of the local telephone exchange service used for dial-up Internet access service.<sup>24</sup> The notion that carriers have the ability to determine and thus interface with the data traversing a broadband Internet access service is flawed. Content providers setting up virtual private

---

<sup>23</sup> NPRM at ¶ 98.

<sup>24</sup> NPRM at ¶ 37.

networks (VPN's) do so to keep prying eyes out of their data. When looking at the Internet access service, there are truly two distinct pieces of the puzzle: the access provider (*e.g.*, wireless, cable modem or DSL) and the content provider. The two are not necessarily, or even often, the same.

As an example, if a cable modem provider sets up a soft switch and offers voice services, then they are both a content and an access provider for the voice network. However, if a cable modem provider sets up a cable modem termination system only, then it is an access provider only. In either case, the end users can purchase voice content from a third party such as Vonage. In the latter case, the Internet access service is not the mediator of VoIP since they do not provide the call set up, termination etc. Should a third party content provider choose to set up a secured connection such as a VPN across the access providers network, the ability to provide Law Enforcement access to that VPN is not possible from the access provider.

If the Commission and Law Enforcement are intent on securing Law Enforcement's ability to intercept packet-mode communications, not allowing rural carriers to seek further extensions is missing the point. Rather, the Commission should ensure that all packet-mode service providers that the Commission clearly defines as subject to CALEA are provided the same opportunity to obtain a CALEA solution and become compliant or risk enforcement action.

## **VI. NON-MANAGED PACKET MODE INFORMATION MAY BE EXTRACTED FROM THE CORE SWITCH OR ROUTER**

It is the Rural Carriers understanding that non-managed, non-VoIP, packet-mode data, such as e-mails, may be extracted at the "core"<sup>25</sup> Internet switch or "core" router, and the manufacturers of this equipment, such as Cisco, should be responsible for developing a packet-mode solution that can extract this data. It is further the Rural Carriers understanding that a

“mediation” device would need to be placed at either the core switch or router to extract non-managed packet-mode data. This being the case, Rural Carriers again stress to the Commission that absent a legal basis to require their equipment manufacturers to devise a packet-mode solution, the Rural Carriers cannot become packet-mode compliant.

## **VII. THE TRUSTED THIRD PARTY APPROACH MAY BE BENEFICIAL FOR LARGE CARRIERS WITH MANY REQUESTS FOR INTERCEPTS BUT NOT FOR SMALL RURAL CARRIERS**

Rural Carriers understand that utilizing a “trusted third party” may assist some carriers in making content or call identifying information available to Law Enforcement. However, this approach may not be beneficial for small rural carriers that have few or no intercepts. The Rural Carriers are also concerned that the use of a “trusted third party” would open up their networks to third parties such as VeriSign, and there would be no way to police what information, or when information was being extracted. Secondly, for the due to the nominal quantity of intercepts Rural Carriers have received, this solution would not be economical because there would be monthly recurring fees just to have the service available.

## **CONCLUSION**

Rural Carriers realize the importance of Law Enforcement’s ability to intercept call content and/or call identifying information as it pertains to packet-mode technology. However, based upon the foregoing, the Commission should allow all small and rural carriers to continue to seek Section 107(c) extensions for any of CALEA’s capability requirements and should continue to provide a temporary, conditional extension to any carrier that files a complete extension request as well as to any carriers that file a Section 109(b) waiver request. Furthermore, the Commission and Law Enforcement should consider the significant costs borne by the Rural Carriers in upgrading their facilities to comply with CALEA. Finally, Rural

---

<sup>25</sup> “Core” meaning the main switch or router which connects the network to the World Wide

Carriers look forward to participating to the fullest extent in this proceeding, including the presentation of *Ex Parte* comments to further elaborate on the issues discussed herein.

Respectfully submitted,

RURAL TELECOMMUNICATIONS PROVIDERS

By: \_\_\_\_\_/s/  
MARY KATHRYN KUNC, OBA #15907  
RON COMINGDEER, OBA #1835  
KENDALL W. PARRISH, OBA #15039  
COMINGDEER, LEE & GOOCH  
6011 N. Robinson  
Oklahoma City, OK 73118  
(405) 848-5534  
(405) 843-5688 (fax)

\_\_\_\_\_/s/  
TAMBER RAY  
THE ADAMS LEGAL FIRM, LLC  
1474 North Point Village Center #301  
Reston, VA 20194  
(703) 738-4812  
(757) 273-1120 (fax)

ATTORNEYS FOR THE RURAL CARRIERS

**Rural Telecommunications Providers**

Atlas Telephone Company  
Beggs Telephone Company  
Berkshire Telephone Corp.  
Big Sandy Telecom, Inc.  
Bixby Telephone Company  
Bluestem Telephone Company  
Canadian Valley Telephone Company  
Carnegie Telephone Company  
Central Oklahoma Telephone Company  
Chautauqua & Erie Telephone Corporation  
Cherokee Telephone Company  
Chickasaw Telephone Company  
China Telephone Company  
Chouteau Telephone Company  
Cimarron Telephone Company  
Columbine Telecom Company  
The Columbus Grove Telephone Company  
Community Service Telephone Company  
C-R Telephone Company  
Cross Telephone Company  
Dobson Telephone Company  
The El Paso Telephone Company  
Ellensburg Telephone Company  
Fremont Telecom Company  
FreTel Communications, LLC  
GTC Communications, Inc.  
Grand Telephone Company  
Hancock Telephone Company  
Hinton Telephone Company  
Horry Telephone Cooperative, Inc.  
HTC Communications, Inc.  
KanOkla Telephone Association, Inc.  
Maine Telephone Company  
Marianna and Scenery Hill Telephone Company  
McLoud Telephone Company  
Medicine Park Telephone Company  
Northland Telephone Company of Maine, Inc.  
Northland Telephone Company of Vermont  
Odin Telephone Exchange, Inc.  
Oklahoma Telephone & Telegraph, Inc.  
Oklahoma Western Telephone Company  
The Orwell Telephone Company  
Panhandle Telephone Cooperative, Inc.  
Peoples Mutual Telephone Company



Perry-Spencer Rural Telephone d.b.a. PSC  
Pioneer Telephone Cooperative, Inc.  
Pottawatomie Telephone Company  
Ringgold Telephone Company  
Salina-Spavinaw Telephone Company  
Santa Rosa Telephone Cooperative, Inc.  
Scott County Telephone Company  
Shidler Telephone Company  
Sidney Telephone Company  
South Central Telephone Association, Inc.  
Southwest Oklahoma Telephone Company  
Standish Telephone Company  
Sunflower Telephone Company  
Taconic Telephone Corporation  
Terral Telephone Company  
Valliant Telephone Company  
Yates City Telephone  
YCOM Networks, Inc.